

AT&T Services, Inc. 1120 20th Street, NW Suite 1000 Washington, DC 20036

T: 202.457.3851 F: 832.213.0243

September 6, 2007

EX PARTE

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Wireless E911 Location Accuracy Requirements (PS Docket No. 07-114); Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems (CC Docket No. 94-102); Association of Public-Safety Communications Officials-International, Inc. Request for Declaratory Ruling and 911 Requirements for IP-Enabled Service Providers (WC Docket No. 05-196).

Dear Ms. Dortch:

Yesterday, I spoke on the telephone with Bruce Gottlieb, Legal Adviser to Commissioner Copps, regarding the aforementioned proceeding. In that discussion, I emphasized our prior filings in this proceeding on the current technical feasibility of implementing location accuracy at the PSAP level. I also stated that if the Commission were to require carriers to comply with that new standard it should set the effective date far enough in the future to make the goal achievable. I reminded Mr. Gottleib that the Commission had allowed five years for handset replacement previously and that carriers would likely need at least that much if handset replacement was required to achieve location accuracy at the PSAP level.

In accordance with Section 1.1206 of the Commission's rules, an electronic copy of this letter and its attachment is being submitted via the Commission's Electronic Comment Filing System.

Sincerely,

Robert W. Zenny.